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In re:	: Chapter 11
	:
SII LIQUIDATION COMPANY, <i>et al.</i>	: Case No. 10-60702
	:
Debtors.	: Judge Russ Kendig
	:
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SCHWAB INDUSTRIES, INC.,	:
	:
Plaintiff,	:
	:
v.	:
	:
HUNTINGTON NATIONAL BANK, <i>et al.</i>	: Adv. Proc. Nos. 14-6024, 14-6025
	:
Defendants.	:
	:
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Under Fed. R. Bankr. P. 9011, 28 U.S.C. § 1927, and 11 U.S.C. § 105(a), defendants Hahn Loeser & Parks LLP, Lawrence E. Oscar, and Andrew Krause (the HLP defendants) respectfully request that the Court impose sanctions against plaintiff Schwab Industries, Inc. and its counsel, Charles V. Longo. The Court should order the plaintiff and its attorneys, jointly and severally, to reimburse the HLP defendants for the reasonable costs and attorneys' fees they have incurred in these adversary proceedings. A memorandum in support is attached.

Respectfully submitted,

/s/ Daniel R. Warren

Daniel R. Warren (0054595)
Thomas D. Warren (0077541)
Michael A. VanNiel (0073948)
Karen E. Swanson Haan (0082518)
Baker & Hostetler LLP
1900 E. 9th Street
Cleveland, OH 44114
Tel: (216) 621-0200
Fax: (216) 696-0740
dwarren@bakerlaw.com
twarren@bakerlaw.com
mvanniel@bakerlaw.com
kswansonhaan@bakerlaw.com

Jack B. Cooper (0069321)
Day, Ketterer Ltd.
200 Market Ave. North, Suite 300
Canton, OH 44702
Tel: (330) 458-2033
Fax: (330) 455-2633
jbcooper@day-ketterer.com

*Attorneys for defendants Andrew Krause,
Lawrence E. Oscar, and Hahn Loeser &
Parks LLP*

CERTIFICATE OF SERVICE

I certify that on November 24, 2014, a true and correct copy of defendants Hahn Loeser & Parks LLP, Lawrence E. Oscar, and Andrew Krause's Motion for Sanctions and Memorandum in Support were served:

Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

Daniel R. Warren on behalf of defendants Hahn Loeser & Parks LLP, Lawrence E. Oscar, and Andrew Krause at dwarren@bakerlaw.com

Thomas D. Warren on behalf of defendants Hahn Loeser & Parks LLP, Lawrence E. Oscar, and Andrew Krause at twarren@bakerlaw.com

Michael A. VanNiel on behalf of defendants Hahn Loeser & Parks LLP, Lawrence E. Oscar, and Andrew Krause at mvanniel@bakerlaw.com

Karen E. Swanson Haan on behalf of defendants Hahn Loeser & Parks LLP, Lawrence E. Oscar, and Andrew Krause at kswansonhaan@bakerlaw.com

Andrew Nicoll on behalf of defendant Huntington National Bank at anicoll@porterwright.com (in Adv. No. 14-6024)

Matthew D. Greenwell on behalf of plaintiff Schwab Industries, Inc. at matt@cylongolaw.com

Charles V. Longo on behalf of plaintiff Schwab Industries, Inc. at cylongo@cylongolaw.com

United States Trustee on behalf of United States Trustee at (Registered address)@usdoj.gov

And by regular U.S. mail, postage prepaid, on:

Andrew Nicoll on behalf of defendant Huntington National Bank (in Adv. No. 14-6025) at:
Porter Wright Morris & Arthur LLP
41 S. High Street, Suites 2800-3200
Columbus, Ohio 43215

/s/ Daniel R. Warren

Daniel R. Warren (0054595)

Baker & Hostetler LLP

1900 E. 9th Street

Cleveland, OH 44114

Tel: (216) 621-0200

Fax: (216) 696-0740

dwarren@bakerlaw.com